



U.S. Department of Justice

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December 20, 2021

The Honorable Catherine C. Blake
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *United States v. Farace et al.*,
Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace ("R. Farace") and Joseph Farace ("J. Farace"), have each been charged in a one-count indictment charging them with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). The defendants had their initial appearances, and J. Farace his arraignment, on October 8 and October 6, respectively.

The parties thereafter met and conferred regarding discovery as required by Rule 16.1. The government has now made two discovery productions including one production with device images that required a 3-terabyte hard drive. Rolling discovery productions remain ongoing, though the government expects Rule 16 to be substantially complete in the next 45 days. Due to the ongoing discovery and the trial schedules of defense counsel in this matter, the parties respectfully submit that a further status report in this matter due in 45 days would be appropriate. The parties have further agreed, for similar reasons, to toll the Speedy Trial Clock during this period, and will file a motion seeking this Court's approval in this regard forthwith.

Very truly yours,

_____/s/_____
Dana J. Brusca
Assistant United States Attorney

cc: Gerry Ruter, Esq. (via ECF)
David Little-Washington, Esq. (via ECF)